

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION**

BRIAN H. CLARK,

Plaintiff,

v.

Civil Action No. 4:17-cv-00045-JLK-RSB

ROB COLEMAN

Defendant,

JOINT MOTION EXTENDING DISCOVERY

The plaintiff, Brian H. Clark (“Clark”), by counsel, and the defendant, Captain Rob Coleman (“Coleman”), by counsel, jointly move the Court to extend the discovery cut-off in this case for the limited purpose of the depositions on September 5, 2018 to occur in Patrick County, Virginia, of three deponents: (a) Brian Clark; (b) Deputy Clerk Carolyn Cobbler (“Cobbler”) and (c) Bailiff Ralph Carroll (“Carroll”).

Because this motion is jointly submitted by the two remaining parties, there would be no prejudice to either Clark or Coleman if this motion is granted. Clark and Coleman, by counsel, seek leave for the taking of such depositions in order to better prepare for the trial of this case, set to begin on September 24, 2018.

CONCLUSION

WHEREFORE, Clark and Coleman pray that the Court enter an Order allowing an extension of the discovery deadline for the limited purpose of allowing depositions on September 5, 2018 of Clark, Deputy Clerk Cobbler, and Bailiff Carroll. A proposed order has been sent by email to chambers.

Respectfully submitted,

BRIAN H. CLARK

By S/ Henry W. McLaughlin
Counsel

Henry W. McLaughlin (VSB No 07105)
The Law Office of Henry McLaughlin, P.C.
707 East Main Street, Suite 1050
Richmond, Virginia 23219
(804) 205-9020; fax (804) 205-9029
henry@mclaughlinlaw.com
Counsel for Brian H. Clark.

Respectfully submitted,

ROB COLEMAN

By S/ John C. Johnson
Counsel

John Chadwick Johnson (VSB No. 33133)
Frith Anderson & Peake, PC
29 Franklin Road SW
Roanoke, Virginia 24011
Phone: (540) 725-3363
Fax: (540) 772-9167
jjohnson@faplawfirm.com
Counsel for Captain Rob Coleman

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of August, 2018 I electronically filed the foregoing Joint Motion with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record:

Henry W. McLaughlin
The Law Office of Henry McLaughlin, PC
Eight and Main Building
707 East Main Street, Suite 1050
Richmond, VA 23219
Email: henry@mclaughlinvalaw.com
Counsel for the Plaintiff

/s/ John C. Johnson
John C. Johnson
Virginia State Bar No.: 33133
Counsel for Robert Coleman
FRITH ANDERSON + PEAKE, PC
29 Franklin Road, SW
P.O. Box 1240
Roanoke, Virginia 24006-1240
Phone: 540/772-4600
Fax: 540/772-9167
Email: jjohnson@faplawfirm.com